

ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020
 TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733
 www.andersonkill.com

Jerry S. Goldman, Esq.
 Jgoldman@andersonkill.com
 212-278-1569

Via ECF

August 6, 2024

The Honorable George B. Daniels
 U.S. District Judge
 United States District Court
 Southern District of New York
 Daniel P. Moynihan U.S. Courthouse
 500 Pearl Street
 New York, NY 10007

The Honorable Sarah Netburn
 U.S. Magistrate Judge
 United States District Court
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD)
 (SN) – United States Victims of State Sponsored Terrorism Fund Update

Dear Judge Daniels and Magistrate Judge Netburn:

We write to provide the Court with an update regarding the U.S. Department of Justice-administered United States Victims of State Sponsored Terrorism Fund (“USVSST Fund”). Recently, we requested that the Special Master of the USVSST Fund extend the July 1, 2024 deadline for the submission of new claims and judgments for consideration for the fifth round of distributions (currently scheduled to be authorized by January 1, 2025), given that several judgment motions remained outstanding. *See* ECF Nos. 9745 & 9982 (listing outstanding judgment motions as of June 21, 2024), which are attached hereto as Exhibits A and B. On July 5, 2024, the Special Master denied counsels’ extension request for new claims. However, the Special Master noted that to the extent supplemental (economic) damage awards were still pending, a deadline for submitting such claims for purposes of the fifth round had not yet been announced. In other words, the USVSST Fund fifth round deadline remains open for supplemental economic damages claims. The Special Master’s letter is attached hereto as Exhibit C. Counsel notes that the following pending judgment motions seek supplemental economic damages:

Date Filed	MDL ECF No.	Related Civil No.	Document Title	Type of Claim
04/10/2024	ECF 9677, 9681 <i>et seq.</i>	<i>Ashton</i> 02-cv-6977	The <i>Ashton</i> 26 Motion for Final Damages for Estate Plaintiffs Without Prior Economic Loss Judgments and Solatium Plaintiffs Without Prior Judgments	9/11 Decedent Economic Loss (ECF 9681-2, for U.S. Nationals, ECF 9681-3; for non-U.S. Nationals) and

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				Immediate Family Member Solatium (ECF 9681-4)
5/20/2024	ECF 9818	<i>Jimenez</i> , 18-cv-11875 <i>Aamoth, Sr.</i> , 18-cv-12276 <i>King</i> , 22-cv-05193	Non-U.S. National Plaintiffs' Notice of Motion for Final Judgment as to Liability and for Partial Final Judgment for Damages Against the Islamic Republic of Iran	9/11 Decedent Economic Loss and Immediate Family Member Solatium
5/24/2024	ECF 9829	<i>Morris</i> , 18-cv-05321 <i>Bernaerts</i> , 19-cv-11865	Non-U.S. National Plaintiffs' Notice of Motion for Partial Final Damages Judgments Against the Islamic Republic of Iran	9/11 Decedent Economic Loss
06/17/2024	ECF 9910	<i>Hemenway</i> , 18-cv-12277 <i>Kim</i> , 18-cv-11870 <i>King</i> , 22-cv-05193	Moving Plaintiffs' Notice of Motion for Partial Final Damages Judgments	9/11 Decedent Economic Loss and Pain and Suffering
06/17/2024	ECF 9917	<i>Burlingame</i> 02-cv-7230	The <i>Burlingame XV</i> Plaintiffs' Motion for Partial Final Judgments	9/11 Decedent Pain and Suffering and Economic Loss
06/19/2024	ECF 9939, 9942 <i>et seq.</i>	<i>Ashton</i> 02-6977	The <i>Ashton 28</i> Motion for Final Damages for Estate Plaintiffs Without Prior Economic Loss Judgments and Solatium Plaintiffs Without Prior Judgments	9/11 Decedent Economic Damages (ECF 9942-2 for U.S. National; ECF 9942-3 for non-U.S. Nationals) and Immediate Family Member Solatium (ECF 9942-4)
06/20/2024	ECF 9954	<i>Abel Sr.</i> , 18-cv-11837 <i>Mellon</i> , 19-cv-11767 <i>Bodner</i> , 19-cv-11776	Non-U.S. National Plaintiffs' Notice of Motion for Final Judgment as to Liability and for Partial Final Judgment for Damages Against the Islamic Republic of Iran	9/11 Decedent Economic Loss and Pain and Suffering and Immediate Family Member Solatium

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		<i>Aron</i> , 20-cv-09376		
06/20/2024	ECF 9959	<i>Ades</i> , 18-cv-07306	Moving Plaintiff's Notice of Motion for Partial Final Damages Judgment	9/11 Decedent Economic Loss
06/21/2024	ECF 9977, 9979 <i>et seq.</i>	<i>Ashton</i> , 02-cv-6977	The <i>Ashton 29</i> Motion for Final Damages for Estate Plaintiffs Without Prior Economic Loss Judgments	9/11 Decedent Economic Damages (ECF 9979-2 for U.S. Nationals)
06/25/2024	ECF 9999, 10001 <i>et seq.</i>	<i>Ashton</i> 02-cv-6977	The <i>Ashton 30</i> Motion for Final Damages for Estate Plaintiffs Without Prior Economic Loss Judgments	9/11 Decedent Economic Damages (ECF 10001-2 for U.S. National)
07/22/2024	ECF 10139	<i>DeRubbio</i> , 18-cv-05306 <i>Agyeman</i> , 18-cv-05320 <i>Schlissel</i> , 18-cv-05331 <i>Jimenez</i> , 18-cv-11875 <i>Hemenway</i> , 18-cv-12277 <i>BNY Mellon</i> , 19-cv-11767 <i>Bodner</i> , 19-cv-11776 <i>Bernaerts</i> , 19-cv-11865 <i>Asaro</i> , 20-cv-10460 <i>Bianco</i> , 20-cv-10902	Moving Plaintiffs' Notice of Motion for Partial Final Damages Judgments	9/11 Decedent Economic Damages

In anticipation of the USVSST Fund's anticipated deadline for the submission of supplemental damages judgments for inclusion in the fifth round of distributions from the Fund, and also mindful of the Court's schedule and obligations, we write to address any questions or concerns the Court may have regarding judgment submissions made to date or in the future in the

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hopes that we may obtain judgments for these estates of those killed on 9/11 in the terrorist attacks prior to the Fund's deadline.

We thank the Court for its attention to this matter.

Respectfully submitted,

ANDERSON KILL P.C.

By: /s/ Jerry S. Goldman
JERRY S. GOLDMAN
1251 Avenue of the Americas
42nd Floor
New York, NY 10020
Tel.: (212) 278-1000
Email: jgoldman@andersonkill.com

Attorneys for the Plaintiffs

KREINDLER & KREINDLER LLP

By: /s/ Megan Wolfe Benett
MEGAN WOLFE BENETT
485 Lexington Avenue
New York, NY 10017
Tel.: 212-687-8181
Email: mbenett@kreindler.com

Attorneys for the Plaintiffs

SPEISER KRAUSE

By: /s/ Jeanne M. O'Grady
Jeanne M. O'Grady, Esq.
800 Westchester Ave, Ste. S-608
Rye Brook, NY 10573
(914) 220-5333
jog@speiskrause.com

Attorneys for Burlingame Plaintiffs

Enclosures

cc: All MDL Counsel of Record (via ECF)